

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Tariff Filing Requirements for)
Nondominant Common Carriers)

CC Docket No. 93-36

RECEIVED

MAR 29 1993

COMMENTS OF
GE AMERICAN COMMUNICATIONS, INC.

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

GE American Communications, Inc. ("GE Americom") hereby files comments with respect to the Notice of Proposed Rulemaking in the above-captioned proceeding,¹ which proposes to streamline tariff filings by domestic common carriers found to be non-dominant under the Commission's Competitive Carrier policies. GE Americom urges the Commission to adopt these rules and to extend the streamlining to revisions to the international tariffs of non-dominant carriers.

GE Americom pioneered the domestic satellite industry, and, in recognition of the highly competitive environment for domestic satellite carriers, the Commission, in its Competitive Carrier proceedings, found that GE Americom and other domestic satellite carriers were non-dominant in the provision of domestic communications.² Subsequently, the Commission found GE Americom

¹ Order FCC 93-103 (released February 18, 1993) ("NPRM").

² Fourth Report and Order, 95 FCC 2d 554, 568-571 (1983), vacated on other grounds sub nom. AT&T v. FCC, 978 F.2d 727 (D.C. Cir. 1992). See also, Fifth Report and Order, 98 FCC 2d 1191, 1200-01 (1984), recon., 59 RR 2d 543 (1985).

2 of Copies rec'd
LMD:GCE

074

In the NPRM, the Commission tentatively concluded, as a matter of policy, that:

existing tariff regulation of non-dominant carriers inhibits price competition, service innovation, entry into the market, and the ability of firms to respond quickly to market trends. In particular, we tentatively conclude that some of our existing streamlined tariff filing requirements are unnecessary for, and burdensome on, nondominant carriers.⁴

These observations are as true for the provision of international communications by non-dominant carriers as they are ~~for domestic communications, underlining the necessity for the~~

is disadvantageous in that, among other consequences, it "delays